

EXHIBIT G

From: [Nicole E. Price](#)
To: [Innessa M. Huot](#); [Alex J. Hartzband](#)
Cc: [Mary Ellen Donnelly](#)
Subject: Re: Ruderman v. Law Office of Yuriy Prakhin - Subpoena
Date: Thursday, February 18, 2021 8:47:08 AM

Innessa,

We have delayed responding to your email as we were engaged in further communications with T-Mobile. Now that we have confirmed with T-Mobile that the information we were originally provided is correct, we once again request that Plaintiff consent to Defendants' service of the same subpoena on AT&T.

On February 5, 2021, Defendants received a response from T-Mobile regarding their subpoena. That same day, we contacted T-Mobile's Legal Department. We were informed by the Legal Department that T-Mobile was a service provider for the cellphone number 646-472-6642 ("Plaintiff's cellphone"). However, T-Mobile informed us that AT&T was the service provider for Plaintiff's cellphone in 2018 and the requested records are in the possession of AT&T. Accordingly, on February 5, 2021, we contacted you requesting Plaintiff's consent to the service of the same subpoena on AT&T. Since February 5, 2021, and receiving your February 11, 2021, email, we have engaged in further communications with T-Mobile and confirmed that this information is correct.

At no point have we represented that "records were ever transferred to AT&T" as you stated. While unclear where this misunderstanding originated, this issue is irrelevant to the matter at hand.

Defendants served a subpoena on T-Mobile prior to the close of fact discovery for records regarding Plaintiff's cellphone after receiving no documentation/communications from Plaintiff in response to their numerous discovery demands for such information. Plaintiff has represented that she has no access to any of her 2018 cellphone records or data because she allegedly lost her cellphone. Defendants were informed on February 5, 2021, and have re-confirmed since then, that AT&T is in possession of the necessary and relevant records that Defendants requested.

Defendants have provided sufficient and accurate information regarding their communications with T-Mobile about their subpoena. Plaintiff is not entitled to, nor should require, any documentation from Defendants to consent to the service of the same subpoena on AT&T.

Please provide a response by 5p.m. on Friday, February 19, 2021.

Thank you,
Nicole

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Nicole Elizabeth Price
Putney, Twombly, Hall & Hirson LLP
521 Fifth Avenue
New York, New York 10175
Phone: (212) 682-0020 ext. 205
DD: (212) 682-5433